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VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States Securities and Exchange Commission v. Qin, et al.; No. 20-cv-10849 (LGS)

Dear Judge Schofield:

We are counsel to Robert A. Musiala, Jr., the Court-appointed Receiver, in the above-referenced action. We write to request permission from the Court to allow the Receiver to file a Motion to Set a Bar Date for Claims Against the Receivership Estate (the “Motion”) and to forgo the need to file a pre-Motion Letter or schedule a pre-Motion conference prior to the filing of the Motion per Rule III.A.1. of Your Honor’s Individual Rules and Procedures for Civil Cases.

The Motion sets forth the process by which the Receiver proposes to: (i) provide notice to all potential claimants who believe they have claims against the Receivership Estate; (ii) establish procedures for claimants to submit a claim to the Receiver; and (iii) set a proposed bar date by which all claims must be received by the Receiver. Providing notice to claimants and setting a bar date for the receipt of claims are necessary steps towards developing a Liquidation Plan as authorized and prescribed by the Court.¹ The Motion affords any interested parties the opportunity to be heard regarding the proposed claims procedures and bar date. The U.S. Securities and Exchange Commission has reviewed the Motion and does not object to the relief requested therein. We respectfully submit that a pre-Motion conference is not necessary under these circumstances.

Accordingly, the Receiver respectfully requests the Court grant him permission to file the

¹ See Order Appointing Receiver, *SEC v. Qin, et al.*, No. 20 Civ. 10849 (LGS) (S.D.N.Y. Jan. 21, 2021), ECF No. 31, at XII.44.

Motion without the need to file a pre-Motion Letter or to schedule a pre-Motion conference.

We thank Your Honor for consideration of this request.

Respectfully submitted,

/s/ Marco Molina

Marco Molina
Partner